

**C L I F F O R D**  
**C H A N C E**

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The Honorable Raymond J. Dearie  
United States District Judge  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

May 3, 2016

**Re: United States v. Jeffrey Webb, et al., 15 Cr. 252 (RJD)**

Dear Judge Dearie:

We write to respectfully request that Mr. Webb's bail conditions be modified to: (i) permit Mr. Webb to travel up to 50 miles from his home in Loganville, Georgia, during the hours of 8:00 AM to 5:00 PM, seven days a week, for the purpose of running errands and to facilitate care of his infant son, and to (ii) allow Mrs. Gamble-Webb's passport to be returned to her so that she may travel outside the United States for both work and family purposes. All other bail conditions shall remain the same.

We make this request to extend the radius of Mr. Webb's travel to within 50 miles of his home during the approved hours, to accommodate for the distance from Mr. Webb's home to the surrounding metropolitan areas that he may need to visit to accomplish household errands or for the care of his son. Under the 20-mile limit previously approved by the Court on November 23, 2015, Mr. Webb has on occasion encountered logistical difficulties with respect to fulfilling his household errands and the care of his infant son.

With respect to the request to return Mrs. Gamble-Webb's passport, she wishes to make a trip to the Bahamas with her son and other family members (not including Mr. Webb) that is planned for the first-half of August 2016 (the full payment for which is due May 22, 2016), and to attend a medical conference to be held in Mexico in the second-half of October 2016 that she will participate in as part of her medical practice. When Mr. Webb's bail conditions were first set at his arraignment on July 18, 2015, it included a provision that Mrs. Gamble-Webb also surrender all of her passports to the FBI. (*See* Docket Entry 38, at 2.) We respectfully submit that there is no longer any need for Mr. Webb's bail conditions to continue to burden Mrs. Gamble-Webb's travel.

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We have consulted with Assistant United States Attorney Amanda Hector and Pretrial Services Officers Anna Lee in this district and Rana Riner in the Northern District of Georgia (where Mr. Webb currently resides pursuant to the terms of his bail) regarding this application, and they do not oppose the requested modifications.

Mr. Webb's \$10 million personal recognizance bond remains secured by 12 sureties on the bond, and we respectfully submit that the requested modifications present no material easing of Mr. Webb's bail conditions that were previously explained to and consented by each of the 12 sureties in connection with the bail modifications granted by the Court on November 23, 2015. Accordingly, we do not believe that any further consent is required from the sureties with regard to this application.

For the foregoing reasons, and given that there is no government objection to this application, we respectfully request that the Court approve the requested modifications in the enclosed proposed order.

Respectfully submitted,

/s/ Edward C. O'Callaghan

Edward C. O'Callaghan  
Ernie Gao

Encl.

cc: United States Attorney's Office, Eastern District of New York (by ECF)  
Pretrial Services Office, Eastern District of New York (by e-mail)  
Pretrial Services Office, Northern District of Georgia (by e-mail)